



1400 Ramona Ave. Kalamazoo, MI 49002 269-327-1045

December 23, 2002

The Honorable Michael K. Powell
Chairman, Federal Communications Commission
445 12th Street, SW, Room 8-B201
Washington, DC 20554

Re: Amendment of Section 90.20 and 90.175 of the Commission's Rules for
Frequency Coordination of Public Safety Frequencies in the Private Land
Mobile Radio Below-470 MHz Band; WT Docket No. 02-285

Dear Mr. Chairman:

The Commission released a *Notice of Proposed Rulemaking* on September 19, 2002, soliciting comments on a Petition for Rulemaking that was submitted by APCO on February 21, 2001. APCO's Petition asked the Commission to introduce competitive coordination to the public safety frequency pools below 512 MHz. We support APCO'S Petition and think public safety coordination should be opened to all FCC-certified, industrial business and public safety frequency coordinators.

I have been supplying and servicing critical communications systems for my public safety and private wireless customers through my private land mobile radio dealership since 1950. We have a long standing relationship with these clients and on many occasions have filed and assisted with filings for licenses, not all have been positive experiences. I believe it is this experience that gives credibility to my following comments on the above-mentioned proceeding.

There are intrinsic benefits of competition in any market place, frequency coordination included. When organizations are not able to automatically rely on a flow of business, regardless of cost and quality of service, improvements will be made quickly to stay competitive. I find it very frustrating that I have to a part of bad customer service and an inefficient process at inflated costs for public safety coordination because the current system offers me no choices. This is why we believe public safety coordination should be open to all public safety and industrial business FCC-certified frequency coordinators.

My experiences with ITA for application processing and frequency coordination have always been excellent. They have always been eager and accommodating to help us on any issue. All of the employees I have dealt with at ITA are very helpful in directing me to the proper person and my phone calls are always promptly returned. Unfortunately, this has not been the case with my experiences at APCO. I believe they have lost their focus on the importance of customer service because they realize their customers cannot go to another organization.

I encourage the Commission to amend its rules to permit public safety coordination services opened to all industrial business and public safety frequency coordinators. This would allow the benefits of competition to be acknowledged by public safety entities as well as any business that must use public safety frequency coordinators.

I look forward to working with the Commission on this issue.

John R. Carnago
President